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October 15, 2020

VIA ECF

The Honorable Margo K. Brodie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Ng Chong Hwa a.k.a Roger Ng, 18 Cr. 538 (MKB)

Dear Judge Brodie:

We represent Roger Ng in the above-captioned case and write with the consent with the government to propose a brief adjournment of the previously-ordered motion schedule. (See 10/1/2020 Order.) At the October 6, 2020 status conference, the parties informed the Court that we have been in contact with one another regarding a Letter for Particulars that we sent to the Government. Since the conference, we have engaged in substantive discussions with the government regarding Mr. Ng's Letter for Particulars that may obviate the need for a lengthy Bill of Particulars motion.

The parties have conferred and propose the following briefing schedule for the dispositive and discovery motion deadlines:

10/30 – Defense Motions Due  
12/4 – Government Opposition Due  
12/14 – Defense Reply Due

BRAFMAN & ASSOCIATES, P.C.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'MA Agnifilo', written in a cursive style.

Marc A. Agnifilo, Esq., *Of Counsel*

Zach Intrater, Esq., *Of Counsel*

Teny R. Geragos, Esq.

Jacob Kaplan, Esq.

cc: Counsel for the Government (via ECF)